

EXHIBIT A

Form of Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:) Chapter 11
W. R. GRACE & CO., et al.,¹)
Reorganized Debtors.) Case No. 01-01139 (AMC)
) (Jointly Administered)
) Re docket no. _____
) Hearing Agenda item no. _____

**ORDER EXTENDING PLAN CLAIMS OBJECTION DEADLINE THROUGH
NOVEMBER 30, 2021**

Upon consideration of the *Reorganized Debtor's Ninth Motion for an Order Extending the Chapter 11 Plan Deadline by Which the Reorganized Debtor May Object to Claims* (the "Motion"), it appearing that the relief requested is in the best interests of the Reorganized Debtor, its estate, its creditors, and other parties-in-interest; the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to Plan Art. X, 28 U.S.C. §§ 157 and 1334, and the *Amended Standing Order of Reference from the United States District Court for the District of Delaware*, dated February 29, 2012; consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b), and that this Court may enter an order consistent with Article III of the United States Constitution; venue being proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409; notice of the Motion having been adequate and appropriate under the circumstances; and after due deliberation and sufficient cause appearing therefor, it is hereby ORDERED that:²

1. The Motion is granted in its entirety.

¹ W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc., or "Grace") is the sole remaining Reorganized Debtor and Case no. 01-1139 is the sole remaining open chapter 11 case.

² Capitalized terms not defined herein shall have the meaning ascribed to them in the Plan or Motion, as the case may be.

2. The deadline for objecting to open, unresolved, non-asbestos Plan Claims (the “Claims Objection Deadline”), which is set forth in Art. 5.1 of the *First Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code of W. R. Grace & Co., et al., the Official Committee of Asbestos Personal Injury Claimants, the Asbestos PI Future Claimants’ Representative, and the Official Committee of Equity Security Holders as Modified Through December 23, 2010* [Docket No. 26368] (as it may be amended or supplemented, the “Plan”), is extended through November 30, 2021.
3. This Order is without prejudice to: (a) further requests by the Reorganized Debtor to request further extensions of the Claims Objection Deadline as may be necessary to resolve open, unresolved, non-asbestos Plan Claims; and (b) the Reorganized Debtor’s right to object to claims that are late-filed or otherwise newly filed or amended after the date of entry of this order.
4. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such motion and the requirements of Fed. R. Bankr. P. 6004(a) and the local rules of the Court are satisfied by such notice.
5. The Court shall retain jurisdiction to hear and determine all matters arising from or relating to the implementation of this Order and the Claims Objection Deadline, including but not limited to further extensions thereof.

6. This Order shall be effective and enforceable immediately upon entry and its provisions shall be self-executing and shall not be stayed under Fed. R. Bankr. P. 7062 or otherwise.

Dated: _____, 2020

The Honorable Ashely M. Chan
United States Bankruptcy Judge